



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

LYNNETTE MASON,)
Plaintiff,)
v.)
LYNDEE HARRISON,)
Defendant.

No. CJ- 2017- 1184

SEP 25 2017

FILED

COURT CLERK
In the office of the
Court Clerk MARILYN WILLIAMS

PETITION

Plaintiff, LYNNETTE MASON, for her cause of action against the Defendant,
LYNDEE HARRISON, states:

1. On November 4, 2015, Plaintiff was driving a 2005 Nissan Maxima westbound on the inside lane of N.W. 12th, near N.W. 12th and N. Norman Ave., in Moore, Oklahoma. Plaintiff came to a stop due to traffic. Defendant, driving a 2011 Nissan Maxima, was also westbound behind Plaintiff, and negligently struck the rear of the vehicle Plaintiff was driving.

2. This Court has jurisdiction over the parties and subject matter as the acts complained of herein occurred in Cleveland County.

3. Defendant was negligent and negligent per statute in the way she struck Plaintiff's vehicle. Defendant violated 47 OS Section 11-310 by following more closely than is reasonable; 47 OS Section 11-801A. by driving at

EXHIBIT 22

a speed that did not permit Defendant to stop; 47 OS Section 11-901b, by not giving full time and attention. Defendant violated Moore Municipal Code: Chapter 7 Section 15-511 by following more closely than is reasonable; Chapter 7 Section 15-515 by negligent driving; Chapter 7 Section 15-516 by not giving full attention; Chapter 7 Section 15-701 by driving at a speed that did not permit Defendant to stop.

4. As a result of the negligence of the Defendant, Plaintiff was injured, and her injuries are permanent, painful, and progressive.

5. As a result of the injuries, Plaintiff has and will incur medical expenses, has and will lose earning capacity, and has and will suffer pain of mind and body.

WHEREFORE, Plaintiff asks for judgment against the Defendant, in excess of \$10,000.00, interest, costs, attorney's fees and any other relief by law or equity to which they may be entitled.

ATTORNEY'S LIEN CLAIMED.

Andrew Gass
ANDREW GASS, OBA #3279
Attorney for Plaintiff
PO Box 20034
Oklahoma City, OK 73156
(405) 749-6700 phone
(405) 749-6761 fax